



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JUL 10 2014

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

Article number: 7005 3110 0000 5966 5978

Mr. Peter Sidoti  
Director, Team Leader  
Environmental, Health & Safety  
Pfizer Inc.  
601 N Middletown Road  
Pearl River, NY 10965

**Re: Notice of Violation  
Pfizer Inc.  
EPA ID # NYD054065909**

Dear Mr. Sidoti:

This Notice of Violation is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901, 6928.

Pursuant to RCRA, as amended by HSWA, the U. S. Environmental Protection Agency (EPA) promulgated rules, regulations, and standards governing the handling and management of hazardous waste as set forth in 40 C.F.R. Parts 260-272.

For the purposes of this Notice of Violation, the hazardous waste regulations governing the generation of hazardous waste were promulgated in 1980 and amended by HSWA in 1984.

The State of New York is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926 and is authorized to enforce RCRA. EPA has retained its authority to enforce the hazardous waste rules and regulations in the State of New York.

From a review of manifests, it has been determined that your facility is a Large Quantity Generator (LQG) of hazardous waste. On or about April 3, 2014, a Compliance Evaluation Inspection (CEI) was conducted at Pfizer Inc. located at 601 N Middletown Road, Pearl River, NY 10965. As a result of the CEI, the following violations of the RCRA regulations were identified:

1. Pursuant to 6 NYCRR § 373.3-9 (e), a LQG must inspect its hazardous waste containers in its hazardous waste container storage area once weekly.

At the time of the inspection, the Pfizer Inc. did not have records to demonstrate it had conducted inspections of its hazardous waste containers in its hazardous waste container storage area on thirty seven occasions in the past three years.

2. Pursuant to 6 NYCRR § 374-3.2 (e) (5), a small quantity handler of universal waste must label each lamp or container with the words “Universal Waste-Lamps” or “Waste Lamps” or “Used Lamps.”

At the time of the inspection, Pfizer Inc. stored four boxes of spent fluorescent lamps which were not labeled with the words “Universal Waste-Lamps” or “Waste Lamps” or “Used Lamps” in violation of 6 NYCRR § 374-3.2 (e) (5).

3. Pursuant to 6 NYCRR § 374-3.2 (e) (1), a small quantity handler of universal waste must label each battery or each container of batteries with the words “Universal Waste-Batteries” or “Waste Batteries” or “Used Batteries.”

At the time of the inspection, Pfizer Inc. stored 40 NiCd batteries which were not labeled.

4. Pursuant to 6 NYCRR § 374-3.2 (e) (1), a small quantity handler of universal waste must be able to demonstrate the length of time that universal waste was accumulated by marking the date, by inventory or by any other method.

At the time of the inspection, Pfizer Inc. did not mark the dates on the boxes of spent fluorescent light bulbs and spent batteries described in paragraphs 2 and 3, and was unable to demonstrate the length of time these universal wastes were accumulated.

Please submit, within thirty (30) days of the receipt of this correspondence, a response which includes [1] a description of the actions you have taken to correct the violations described above, [2] documentation demonstrating that the violations have been corrected and (3) steps taken to prevent a recurrence of the violations.

Failure to comply and submit the documentation requested in this Notice of Violation may subject you and/or your company to the enforcement provisions of Section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this letter, please contact Mr. Abdool Jabar at 212 637-4051.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'LV' or similar, written over a horizontal line.

Leonard Voo, Chief  
Hazardous Waste Compliance Branch

cc: Russ Brauksieck, Supervisor  
Hazardous Waste Compliance Unit  
New York State Department of Environmental  
Conservation